



4301 Wilson Boulevard Arlington, Virginia 22203-1860 Telephone: (703) 907-5500 TT-(703) 907-5957 www.nreca.org

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September 24, 2001

Ms. Carol Hanlon U.S. Department of Energy Yucca Mountain Site Characterization Office (M/S #025) P.O. Box 30307 North Las Vegas, Nevada 89036-0307

Dear Ms. Hanlon:

NRECA is the not-for-profit, national service organization representing more than 900rural electric systems that provide electric service to 35 million customers in 46 states in 2500 of the nation's 3128 counties. Of these systems, 60 are generation and transmission cooperatives that are owned by, and serve, 685 of 870 distribution systems. Ten of the G&Ts own shares of operating nuclear power plants. One cooperative, Dairyland Power Cooperative, LaCrosse, Wisconsin, owns a 50 MW nuclear power plant that has ceased operations but cannot decommission the reactor until the spent nuclear fuel is removed.

NRECA is very supportive of the Department of Energy's lengthy and vigorous scientific investigation of the suitability for the Yucca Mountain site for a nuclear repository. The July publication of the Yucca Mountain Preliminary Site Suitability Evaluation report by the Department of Energy is a result of 20 years of intensive scientific research, engineering design and geologic study to prove the suitability of the repository. The report shows that there is a scientific basis to proceed with the determination to provide safe storage for used nuclear fuel. NRECA's review of the report indicates that through natural and engineered barriers, the actual dose limits for public exposure will be far below the dose limit standards that pertain to radiation as contained in Public Protection Standard 40 CFR 1974.

NRECA believes that this report gives additional support to the findings of other Yucca Mountain studies such as the Yucca Mountain Science and Engineering Report, the Preliminary Preclosure Safety Assessment for Monitored Geologic Repository Site Recommendations and the Total System Performance Assessment for the Site Recommendation. All these studies give adequate support for finding that Yucca Mountain is a suitable site for development of a nuclear repository.

Based upon the scientific analysis presented, and our belief that the Yucca Mountain site is likely to meet the applicable radiation protection standards established by the



Environmental Protection Agency and the Nuclear Regulatory Commission, we believe that the Secretary of Energy should proceed to recommend the site to the President.

On August 27, 2001, Glenn English, Chief Executive Officer of the National Rural Electric Cooperative Association, stated, "The Department of Energy's preliminary recommendation to take the next steps toward approving a nuclear disposal facility at Yucca Mountain in Nevada is good news. It is especially positive for electricity consumers, including those served by electric cooperatives, who have contributed billions of dollars through their electric bills to find a solution to this problem. The industry and its customers have done their part."

"The nation's consumer-owned electric cooperatives still urge DOE to fulfill its obligation under the Nuclear Waste Policy Act by accepting the industry's spent fuel. We also urge the Congress to act to prohibit any jurisdiction's movement against temporary storage and transportation of spent fuel that comply fully with federal regulations," English said.

Thank you for the opportunity to participate in this process.

John Holt

Manager

Generation and Fuels

National Rural Electric Cooperative Association

4301 Wilson Blvd

Arlington, Virginia 22203

703 907 5805

